

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

KTM AG,

Plaintiff,

v.

THE INDIVIDUALS, CORPORATIONS,  
LIMITED LIABILITY COMPANIES,  
PARTNERSHIPS AND PARTNERSHIPS AND  
UNINCORPORATED ASSOCIATIONS  
IDENTIFIED ON SCHEDULE A HERETO,

Defendants.

Case No. 21-cv-1279

Judge Robert M. Dow, Jr.

**DECLARATION OF MICHAEL A. HIERL**

I, Michael A. Hierl, of Chicago, Illinois, declare as follows:

1. I am an attorney at law, duly admitted to practice before the Courts of the State of Illinois and the United States District Court for the Northern District of Illinois. I am one of the attorneys for Plaintiff. Except as otherwise expressly stated to the contrary, I have personal knowledge of the following facts and, if called as a witness, I could and would competently testify as follows.

2. Since and pursuant to entry of the TRO, dozens of Amazon accounts associated with the Defendant Internet Stores have been frozen. Settlement discussions are ongoing. declare under penalty of perjury that the foregoing is true and correct.

Executed on this 17<sup>th</sup> day of May, 2021.

By: s/Michael A. Hierl  
Counsel for Plaintiff

**CERTIFICATE OF SERVICE**

The undersigned attorney hereby certifies that a true and correct copy of the foregoing document was filed electronically with the Clerk of the Court and served on all counsel of record and interested parties via the CM/ECF system on May 17, 2021.

s/Michael A. Hierl